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-and-

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Attorneys for the Defendants

**UNITED STATES DISTRICT COURT
DISTRICT OF COURT OF NEW JERSEY
NEWARK DIVISION**

DREW J. BAUMAN and)
LAW OFFICE OF DREW J. BAUMAN)

Plaintiffs)

v.)

THE HANOVER INSURANCE GROUP,)
THE HANOVER INSURANCE COMPANY)
AND USI INSURANCE SERVICES, LLC)

Defendants

Case No.: 2:22-cv-4551

Judge Claire C. Cecchi

Magistrate Judge James B. Clark

**DEFENDANTS THE HANOVER INSURANCE COMPANY and
THE HANOVER INSURANCE GROUP INC.'S
NOTICE OF MOTION AND MOTION TO DISMISS PLAINTIFFS' COMPLAINT**

PLEASE TAKE NOTICE that, pursuant to Local Rule 7.1, on August 15, 2022 or at such other date as may be agreed upon or ordered, at the United States District Court for the District of New Jersey, located at Martin Luther King Building & U.S. Courthouse, 50 Walnut Street,

Newark, NJ 07102, Defendants The Hanover Insurance Company and The Hanover Insurance Group Inc., by and through their attorneys, Lewis Brisbois Bisgaard & Smith, LLP and Brian C. Deeney, Esq., will and hereby does move this Court for an Order dismissing Plaintiffs' Complaint.

PLEASE TAKE FURTHER NOTICE that this Motion is made pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and is based on this notice of Motion, attorney certification with exhibits, accompanying Brief in Support, all pleadings and papers filed herein, or argument, if any, and any other matter that may be submitted at any hearing of the Motion.

PLEASE TAKE FURTHER NOTICE that Defendants The Hanover Insurance Company and The Hanover Insurance Group Inc. hereby requests oral argument on the Motion pursuant to Local Rule 78.1(b); and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is also submitted herewith.

Respectfully submitted,

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

By: /s/ Brian C. Deeney

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